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February 5, 2002

VIA HAND DELIVERY

Mr. K. David Waddell
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: BellSouth Telecommunications, Inc. Tariff to Modify CCS7 Access Arrangement
TRA Docket No. 02-00024

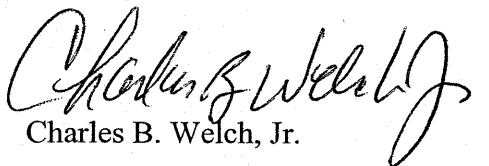
Dear Mr. Waddell:

Enclosed for filing, please find the original plus thirteen (13) copies of the Joint Petition of XO Tennessee, Inc., US LEC of Tennessee, Inc., Time Warner Telecom of the Mid-South, L.P. and ITC^Deltacom Communications, Inc. to Suspend Effective Date in the referenced docket. Copies have been served upon all parties of record.

If you have any questions or concerns with regard to this filing, please do not hesitate to contact me.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.**


Charles B. Welch, Jr.

CBW:lw

Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY

IN RE:)	
)	
BELLSOUTH TELECOMMUNICATIONS,)	Docket No. 02-00024
INC. TARIFF TO MODIFY CCS7)	
ACCESS ARRANGEMENT)	

**JOINT PETITION OF XO TENNESSEE, INC., US LEC OF TENNESSEE INC.,
TIME WARNER TELECOM OF THE MID-SOUTH, L.P., AND ITC^DELTACOM
COMMUNICATIONS, INC. TO SUSPEND EFFECTIVE DATE**

XO Tennessee, Inc. ("XO"), US LEC of Tennessee, Inc. ("US LEC"), Time Warner Telecom of the Mid-South, L.P. ("Time Warner") and ITC^Deltacom Communications, Inc. ("ITC^Deltacom") (collectively the "Petitioners"), petition the Tennessee Regulatory Authority ("Authority") to suspend the effective date of the proposed BellSouth Telecommunication, Inc. ("BellSouth") modification to its Access Arrangement tariff ("Tariff"). In support of their Petition, Petitioners state as follows:

1. Petitioners are authorized, competing local exchange telephone service providers in the State of Tennessee. BellSouth filed the Tariff with the Authority on January 9, 2002 with a requested effective date of February 6, 2002. If the Authority allows the Tariff to become effective as submitted, Petitioners will be required to purchase SS7 services at an increased rate which will increase their cost of providing service to their end user customers. Further, BellSouth's rate modifications will necessitate expensive changes to Petitioners' billing systems.

2. SS7 provides signaling functionality for call routing and completion as well as access to various data bases essential to the operations and management of all networks. It is critical to virtually every phone call with the exception of those instances where the antiquated Dual Tone Multi-Frequency ("DTMF") is still in use. SS7 is a more efficient alternative to DTMF signaling

because it allows faster dialing or “quick call set-up.”

3. The proposed Tariff has a per message Transaction Capabilities Application Part (“TCAP”) and an Integrated Services Digital Network User Part (“ISUP”) charge and monthly recurring charges, in addition to the normal, monthly recurring charge assessed to traffic jurisdictionally classified as interstate. Typically, there are at least five ISUP messages and one TCAP associated with each telephone call. ISUP messages provide for call acknowledgment, call set up, and call processing. A TCAP message is used in connection with providing caller identification, 800 or toll free calls, and caller name and number data base (CNAM). As proposed, the Tariff applies to all telecommunications providers including, without limitation, ILECs, CLECs, IXC, wireless carriers, and third party SS7 providers.

4. Petitioners submit that the Authority must consider certain issues raised by the pending Tariff as follows: (a) whether CLECs employing third party hubbing vendors will be able to take advantage of local interconnection agreement rates or always be charged interstate access rates; (b) whether the Tariff will permit BellSouth to charge an IXC and a CLEC for the same message resulting in a windfall double billing; (c) whether there is any documentation or evidence to support BellSouth’s claim that its reduction to local switching rates maintains revenue neutrality and, if so, how do these rate payment obligations shift among customers; (d) whether it is reasonable to require CLECs and IXCs to calculate and develop a PIU/PLU for SS7 messages; and (e) whether the Tariff, as an intrastate tariff, applies to interstate usage as indicated in Section E.2.3.14.(A)(3).¹

5. The Petitioners’ legal rights, duties, privileges, obligations and other legal interests

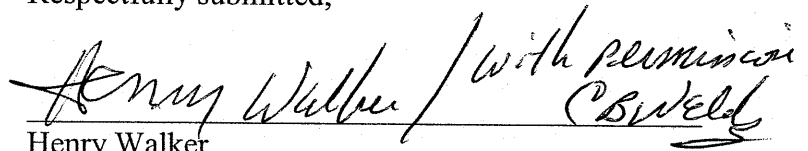
¹The next paragraph in the Tariff currently references “*intrastate*” usage for per message billing.

will be affected and determined by the outcome of this proceeding.

WHEREFORE, premises considered, the Petitioners respectfully request that:

1. BellSouth Tariff Docket No. 02-00024 be suspended pending further investigation;
2. the Authority schedule a contested case hearing or other appropriate proceeding for the consideration of the proposed Tariff; and
3. such other, further, general, and specific relief be granted as may be just and proper under the circumstances.

Respectfully submitted,

 *Henry Walker / with permission CB Welch*

Henry Walker

Boult, Cummings, Conners & Berry, PLC

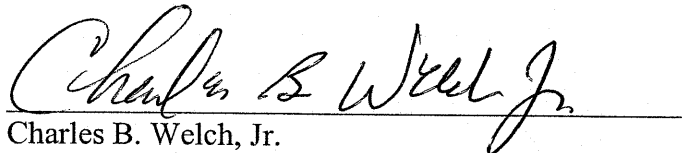
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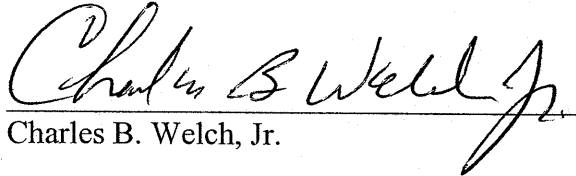
Nashville, TN 37219

*Counsel for Time Warner Telecom of the
Mid-South, L.P.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by placing same in U.S. Mail, postage prepaid, upon the following, this the 5th day of February, 2002.

Guy M. Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37219


Charles B. Welch, Jr.